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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

Cung Le, Nathan Quarry, Jon Fitch, Brandon  
Vera, Luis Javier Vazquez, and Kyle  
Kingsbury on behalf of themselves and all  
others similarly situated,

Plaintiffs,

vs.

Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045-RFB-(PAL)

**STIPULATION AND [PROPOSED]  
ORDER TO FOREGO FURTHER  
MOTIONS TO SEAL RELATING TO  
DEFENDANT ZUFFA, LLC'S MOTION  
TO SEAL PLAINTIFFS' REPLY IN  
SUPPORT OF PLAINTIFFS' MOTION  
TO CERTIFY CLASS AND RELATED  
MATERIALS (ECF NO. 557)**

1 WHEREAS, on June 4, 2018, Defendant Zuffa, LLC (“Zuffa”) filed its Motion to Seal  
2 Plaintiffs’ Reply in Support of Plaintiffs’ Motion to Certify Class and Related Materials (ECF No. 557)  
3 (the “Motion to Seal”), asking the Court to seal certain references and information (the “Disputed  
4 Materials”);

5 WHEREAS, on June 18, 2018, Plaintiffs Cung Le, Jon Fitch, Kyle Kingsbury, Nathan Quarry,  
6 Javier Luis Vazquez, and Brandon Vera (collectively, “Plaintiffs”), filed their Opposition to Zuffa,  
7 LLC’s Motion to Seal Plaintiffs’ Reply in Support of Plaintiffs’ Motion to Certify Class and Related  
8 Materials (ECF No. 558, subsequently replaced by ECF No. 561) (the “Opposition”);

9 WHEREAS, because the Opposition contains references to the Disputed Materials, the  
10 Opposition was filed under seal and a redacted version was filed publicly; and,

11 WHEREAS, in order to preserve its assertion that the Disputed Materials referenced in  
12 Plaintiffs’ Opposition should remain sealed, Zuffa will be required to file another motion to seal, which  
13 Plaintiffs will be required to oppose, which Zuffa will be required to move to seal, and so on *ad infinitum*;

14 WHEREAS, Plaintiffs and Zuffa (collectively, the “Parties”) wish to resolve this potential  
15 problem in a sensible fashion while maintaining their respective positions regarding the Disputed  
16 Materials;

17 WHEREAS, the Parties, having met and conferred on this issue on June 14, 2018, have agreed  
18 that Zuffa shall have until June 26, 2018 to file its reply in support of its Motion to Seal (the “Reply”).  
19 Upon filing of Zuffa’s Reply, the Parties’ respective positions as to the Disputed Materials will be  
20 considered fully briefed and preserved, and ripe for consideration by the Court. Specifically, Zuffa will  
21 not be required to file a motion to seal Plaintiffs’ Opposition, despite the presence of Disputed Materials  
22 in the Opposition, it being understood by each of the Parties and by the Court that Zuffa’s position—  
23 subject to any potential changes in Zuffa’s position that may be expressed in its Reply—is that the  
24 Disputed Materials should be sealed, and Plaintiffs’ position is that the Disputed Materials should not  
25 be sealed.

26 NOW THEREFORE, having considered the representations of the Parties and finding good  
27 cause shown, the Court hereby ORDERS:  
28

1 Pursuant to Local Rule 7-2(b), Zuffa shall have until June 26, 2018 to file its reply in support of  
2 its Motion to Seal (the “Reply”).

3 Upon filing of Zuffa’s Reply, Plaintiffs’ Opposition and Zuffa’s Reply will be considered fully  
4 briefed and ripe for consideration by the Court without further briefing.

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6 IT IS SO ORDERED.

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8 DATED: \_\_\_\_\_

BY: \_\_\_\_\_

9 United States District Judge  
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1 Dated: June 21, 2018

Respectfully Submitted,  
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